

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
Highfields Capital Ltd., Highfields Capital I LP,)	
Highfields Capital II LP,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-10624 MLW
)	
SCOR, S.A.,)	
)	
Defendant.)	
_____)	

**PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT'S
MOTION TO DECLARE HIGHFIELDS' INVESTOR LISTS NOT "PRIVILEGED
MATERIAL" AND IN SUPPORT OF PLAINTIFFS' CROSS-MOTION FOR A
PROTECTIVE ORDER BARRING DISCOVERY FROM PLAINTIFFS' INVESTORS**

**[Redacted Confidential Information and Highly Confidential
Information pursuant to Stipulation and Protective Order]**

Exhibit A

**Plaintiffs' Motion For Leave To File Under Seal A
Supporting Memorandum, Exhibits Thereto, And An Affidavit,
And Further To File Certain Materials For the Court's *In Camera* Review**

**[Redacted Confidential Information and Highly Confidential
Information pursuant to Stipulation and Protective Order]**

FOLEY HOAG LLP

/s/ Ian J. McLoughlin

Lisa C. Wood, BBO# 543811

Kenneth S. Leonetti, BBO #629515

Ian J. McLoughlin, BBO # 647203

Patrick J. Valley, BBO # 663866

Seaport World Trade Center West

155 Seaport Boulevard

Boston, MA 02210-2600

Tel: (617) 832-1000

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e-mail - imclough@foleyhoag.com

Attorneys for Plaintiffs

June 22, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2006, a true copy of the above document was served by hand delivery upon Douglas H. Meal, the attorney of record for Defendant at Ropes & Gray LLP, One International Place, Boston, MA 02110-2624.

/s/ Ian J. McLoughlin

Ian J. McLoughlin, BBO # 647203



May 5, 2006

Lisa C. Wood
Partner
Boston Office
617.832.1117
lwood@foleyhoag.com

Via Facsimile and U.S. Mail

Douglas H. Meal, Esq.
Ropes & Gray LLP
One International Place
Boston, MA 02110

Re: ***Highfields Capital Ltd. v. SCOR, S.A.***
C.A. No. 04-10624-MLW

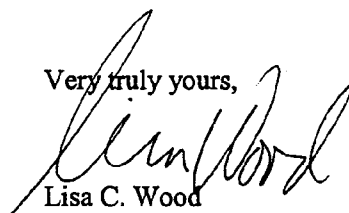
Dear Doug:

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Douglas H. Meal, Esq.
May 5, 2006
Page 2

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa C. Wood", is written over the typed name.

Lisa C. Wood

cc: Kenneth S. Leonetti, Esq.
Giselle J. Joffe, Esq.
James H. Carter, Jr., Esq. (via e-mail)
Ellen V. Holloman, Esq. (via e-mail)

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May 9, 2006

*Via Electronic Transfer
and Facsimile Transmission*

Lisa C. Wood, Esq.,
Foley Hoag LLP,
155 Seaport Blvd.,
Boston, MA 02210-2600.

Re: Highfields Capital Ltd. v. SCOR S.A., CA 04-10624

Dear Lisa:

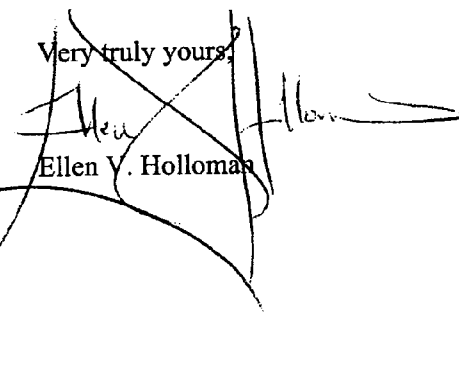
**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Lisa C. Wood, Esq.

-2-

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Very truly yours,


Ellen V. Holloman

cc: Kenneth S. Leonetti, Esq.
Joshua A. McGuire, Esq.
Ian J. McLoughlin, Esq.
Jocelyn Heyman, Esq.
Patrick Vallely, Esq.
(Foley Hoag LLP)

James H. Carter, Esq.
(Sullivan & Cromwell LLP)

Lisa C. Wood, Esq.

-3-

Douglas H. Meal, Esq.
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**FOLEY
HOAG** LLP
ATTORNEYS AT LAW

May 10, 2006

Lisa C. Wood
Partner
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lwood@foleyhoag.com

.pdf File Via E-mail

Ellen V. Holloman, Esq.
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One New Fetter Lane
London EC4A 1AN, England

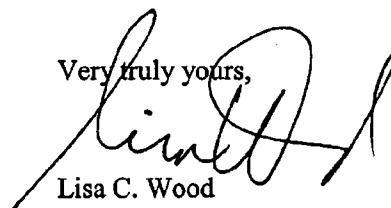
Re: ***Highfields Capital Ltd. v. SCOR, S.A.***
C.A. No. 04-10624-MLW

Dear Ellen:

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Ellen V. Holloman, Esq.
May 10, 2006
Page 2

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Very truly yours,

Lisa C. Wood

cc: Kenneth S. Leonetti, Esq.
Douglas H. Meal, Esq.
Giselle J. Joffre, Esq.
James H. Carter, Jr., Esq.



**FOLEY
HOAG** LLP
ATTORNEYS AT LAW

May 10, 2006

Joshua A. McGuire
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jmcguire@foleyhoag.com

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Ellen V. Holloman, Esq.
Sullivan & Cromwell LLP
One New Fetter Lane
London EC4A 1AN, England

Re: *Highfields Capital Ltd. v. SCOR, S.A.*
C.A. No. 04-10624-MLW

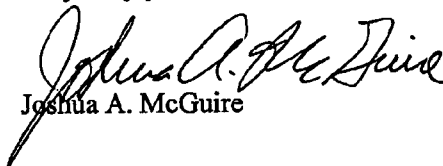
Dear Ellen:

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Ellen V. Holloman, Esq.
May 10, 2006
Page 2

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Very truly yours,



Joshua A. McGuire

Enclosures

cc: Lisa C. Wood, Esq.
Kenneth S. Leonetti, Esq.
Douglas H. Meal, Esq.
Giselle J. Joffre, Esq.
James H. Carter, Jr., Esq.

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May 11, 2006

*Via Electronic Transfer
and Facsimile Transmission*

Lisa C. Wood, Esq.,
Foley Hoag LLP,
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Re: *Highfields Capital Ltd. v. SCOR, S.A., CA 04-10624*

Dear Lisa:

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Lisa C. Wood, Esq.

-2-

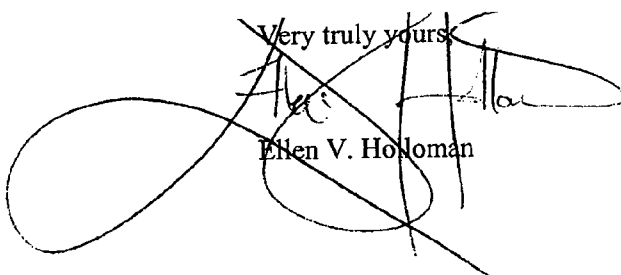
**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Lisa C. Wood, Esq.

-3-

**[Redacted Confidential Information and Highly Confidential Information pursuant to
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Very truly yours,


Ellen V. Holloman

cc: Kenneth S. Leonetti, Esq.
Joshua A. McGuire, Esq.
Ian J. McLoughlin, Esq.
Jocelyn Heyman, Esq.
Patrick Vallely, Esq.
(Foley Hoag LLP)

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June 14, 2006

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Lisa C. Wood, Esq.,
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Boston, MA 02210-2600.

Re: Highfields Capital Ltd. v. SCOR, S.A., CA 04-10624

Dear Lisa:

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Stipulation and Protective Order]**

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The personal liability of our partners is limited to the extent provided in such laws. Additional information is available upon request or at www.sullcrom.com.

A list of the partners' names and professional qualifications is available for inspection at the above address.
All partners are either registered foreign lawyers in England and Wales or solicitors. Regulated by the Law Society.

Exhibit 6

Lisa C. Wood, Esq.

-2-

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Lisa C. Wood, Esq.

-3-

**[Redacted Confidential Information and Highly Confidential Information pursuant to
Stipulation and Protective Order]**

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew R. Stevens', written in a cursive style.

Matthew R. Stevens

cc: Kenneth S. Leonetti, Esq.
Joshua A. McGuire, Esq.
Ian J. McLoughlin, Esq.
(Foley Hoag LLP)

James H. Carter, Esq.
(Sullivan & Cromwell LLP)

Douglas H. Meal, Esq.
(Ropes & Gray LLP)